

**IN THE UNITED STATES DISTRICT COURT
OF THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

ARMSTRONG JACOB KNIGHT, #100175

PLAINTIFF

vs.

CIVIL ACTION NO. 1:05cv186LG-JMR

SHERIFF GEORGE PAYNE, JR., et al

DEFENDANTS

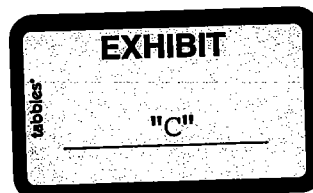
STATE OF MISSISSIPPI

COUNTY OF HARRISON

**AFFIDAVIT OF DIANNE GATSON-RILEY
HARRISON COUNTY ADULT DETENTION CENTER**

PERSONALLY CAME AND APPEARED BEFORE ME the undersigned authority in and for the County and State aforesaid, the within named, DIANNE GATSON-RILEY, who, after first being duly sworn by me on her oath, did depose and state the following:

1. My name is Dianne Gatson-Riley. I am a Major with the Harrison County Sheriff's Office and I am the Director of Corrections for the Harrison County Adult Detention Center and have held this position since January 1, 2000. I have personal knowledge of the matters and facts contained in this Affidavit and I am competent to testify to the matters stated herein.
2. As Director of Corrections for the Harrison County Sheriff's Office, I have first hand knowledge of the policies and procedures of the Harrison County Adult Detention Center.
3. The Harrison County Adult Detention Center itself is continually repaired and maintained as often as funding will permit.



4. During the period of Knight's incarceration at the Harrison County Adult Detention Center, July 22, 2002 through December 30, 2003, Knight received adequate food, shelter, clothing, and medical care. I never received information or otherwise became aware that Knight had a serious need which was not being addressed by the staff of the Harrison County Adult Detention Center, or that he was in any way exposed to a substantial risk of serious damage to his health.
5. As Director of Corrections for the Harrison County Sheriff's Office, I have first hand knowledge of the maintenance and/or storage of records of the Harrison County Sheriff's Office for the Adult Detention Center and what those records reflect, including inmate medical records, inmate court records, inmate grievance reports, inmate request forms, narrative forms, and policies of the Harrison County Sheriff's Office. I have attached hereto as **Exhibit "1"** relevant portions of Armstrong Jacob Knight's records. They are a true and correct copy of Plaintiff's inmate records contained in the files of the Harrison County Adult Detention Center, which are maintained in the regular course of the law enforcement function of the Sheriff of Harrison County and the Harrison County Adult Detention Center, and were generated in the regular course and pursuant to the regular activities of and duties imposed by law upon the office of the Harrison County Sheriff.
6. At all times relevant hereto Plaintiff Armstrong Jacob Knight was incarcerated on pending murder charges, and during the time of the

alleged violations as claimed by Plaintiff, he was considered a pretrial detainee for purposes of analysis under 42 U.S.C. § 1983. See Guilty Plea of Armstrong Jacob Knight attached hereto as **Exhibit "2"**.

7. All Inmate Grievances made at the Harrison County Adult Detention Center are handled in accordance to the *Policies and Procedures Directives*. I have attached hereto as **Exhibit "3"** a copy of the Inmate Grievance policy.
8. As Director of Corrections for the Harrison County Sheriff's Office, I have first hand knowledge of the maintenance and/or storage of records of the Harrison County Sheriff's Office for the Adult Detention Center and what those records reflect. I have attached hereto as **Exhibit "4"**, a true and correct copy of the Rule Violation Reports as to Plaintiff, Armstrong Jacob Knight.

I certify the above declaration is true and correct under penalty of perjury.

/s/Major Dianne Gatson-Riley
Affiant/Major Dianne Gatson-Riley
Harrison County Adult Detention Center

Sworn to and subscribed before me on this the 27th day of February, 2006.

/s/James Darwin McMahan
Notary Public

My Commission Expires: 04/20/07

(SEAL)